

# Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.

JERE LOCKE BEASLEY	J. MARK ENGLEHART <sup>TX</sup>	<i>Attorneys at Law</i>	JOHN E. TOMLINSON	<sup>AZ</sup> ALSO ADMITTED IN ARIZONA
J. GREG ALLEN	CLINTON C. CARTER <sup>AR KY MS MO PA TN</sup>		NAVAN WARD, JR. <sup>MS</sup>	<sup>AR</sup> ALSO ADMITTED IN ARKANSAS
MICHAEL J. CROW	BENJAMIN E. BAKER, JR. <sup>GA NY OR TN DE</sup>	218 COMMERCE STREET	WESLEY CHADWICK COOK	<sup>FL</sup> ALSO ADMITTED IN FLORIDA
THOMAS J. METHVIN	DAVID B. BYRNE, III	POST OFFICE BOX 4160	WILLIAM H. ROBERTSON, V	<sup>GA</sup> ALSO ADMITTED IN GEORGIA
J. COLE PORTIS	TED G. MEADOWS <sup>MS ME TN DE NY</sup>	MONTGOMERY, ALABAMA		<sup>KY</sup> ALSO ADMITTED IN KENTUCKY
W. DANIEL MILES, III	GERALD B. TAYLOR, JR. <sup>AL MS TN TN WV</sup>	36103-4160		<sup>LA</sup> ALSO ADMITTED IN LOUISIANA
R. GRAHAM ESDALE, JR.	FRANK WOODSON	(334) 269-2343	OF COUNSEL:	<sup>MO</sup> ALSO ADMITTED IN MISSOURI
JULIA ANNE BEASLEY	KENDALL C. DUNSON <sup>GA</sup>	TOLL FREE	ALYCE S. ROBERTSON	<sup>MS</sup> ALSO ADMITTED IN MISSISSIPPI
RHON E. JONES	SCARLETTE M. TULEY	(800) 898-2034		<sup>NY</sup> ALSO ADMITTED IN NEW YORK
LABARRON N. ROONE	CHRISTOPHER E. SANSPREE <sup>MS</sup>			<sup>OH</sup> ALSO ADMITTED IN OHIO
ANDY D. BIRCHFIELD, JR.	ROMAN ASHLEY SHAUL <sup>AR LA MS SC TN WV</sup>	TELECOPIER		<sup>OK</sup> ALSO ADMITTED IN OKLAHOMA
RICHARD D. MORRISON <sup>MS</sup>	W. ROGER SMITH, III <sup>AZ NM MS TN WV</sup>	(334) 954-7555		<sup>PA</sup> ALSO ADMITTED IN PENNSYLVANIA
C. GIBSON VANCE	P. LEIGH O'DELL			<sup>SC</sup> ALSO ADMITTED IN SOUTH CAROLINA
J. P. SAWYER <sup>MS OH</sup>	D. MICHAEL ANDREWS	BEASLEYALLEN.COM		<sup>TN</sup> ALSO ADMITTED IN TENNESSEE
C. LANCE GOULD	BENJAMIN L. LOCKLAR			<sup>TX</sup> ALSO ADMITTED IN TEXAS
JOSEPH H. AUGHTMAN	LARRY A. GOLSTON, JR. <sup>FL DE</sup>			<sup>DC</sup> ALSO ADMITTED IN WASHINGTON, D.C.
DANA G. TAUNTON	MELISSA A. PRICKETT			<sup>WV</sup> ALSO ADMITTED IN WEST VIRGINIA

March 15, 2007

JAMES W. TRAEGER  
1953-1987

RONALD AUSTIN CANTY  
1963-2004

## VIA TELEFAX (205) 678-0000

Kate Hortberg  
Boardman, Carr, Weed & Hutcheson, P.C.  
400 Boardman Drive  
Chelsea, Alabama 35043-8211

**RE: A.G., et al. v. Autauga County Board of Education**

Dear Kate:

In reviewing the documents you sent Rick and I concerning the computer file index, I noticed that these are the computer files only for the "My Documents" folder on each of the computers.

The request asked for all the computer files on those particular computers. You have only sent me the file index for the folder entitled "My Documents".

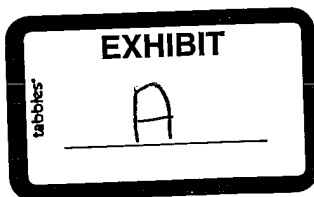
Please have your computer technologist go back and print lists for every file on the computer for Mr. Butler, Mrs. Cleveland, Mrs. Goodson, Mrs. McAlpine, Mr. Ziegler and Mrs. Garrett.

Also, I would appreciate you producing the following computer files from Janie Crawford's computer:

1. Janie's Sublist, 72KB, Date Created: August 10, 2006;
2. Sublist, 265KB, Date Created: August 10, 2006.

Produce the following files from Angel Garrett's computer:

1. File name, Wright-Butler, Date Created: October 22, 2004.



---

Kate Hortberg Letter  
March 15, 2007  
Page 2 of 3

---

Produce the following files from Gloria Goodson's computer;

1. Agenda, 25KB, Date Created: October 28, 2004;
2. Recommendations, 24KB, Date Created: October 28, 2004;
3. Sublist Memo, 25KB, Date Created: October 31, 2004;
4. Agenda, 24KB, Date Created: November 1, 2004;
5. Oct. 25, 27KB, Date Created: November 2, 2004;
6. Minutes 10-28-04, 31KB, Date Created: November 2, 2004;
7. Guideline Memo, 25KB, Date Created: November 4, 2004;
8. Principals Meeting Minutes, 31KB, Date Created:  
November 10, 2004;
9. Minutes-November 1, 2004, 25KB, Date Created:  
November 12, 2004;
10. Guidelines for Substitute Teachers, 28KB, Date Created:  
January 7, 2005;
11. Procedures for Utilization of Substitute Teachers, 27KB,  
Date Created: February 9, 2005.
12. Title IX Non-discrimination and Anti-harassment, 29KB,  
Date Created: January 20, 2006.

These files can be electronically transmitted , can be downloaded on an external hard drive, or downloaded on a DC or floppy disk.

Further, I have discussed the issue of whether or not an index can be produced from the Windows 98 OS program, which Mrs. Cleveland and Mr. Ziegler had on their computer. My computer technician tells me that the index can be produced from those programs.

If you need my computer technician to assist your computer technician, he will be glad to come to the Autauga County Board of Education to do this procedure or instruct your computer technician how the process should be done.

Please let me know when I can expect to receive this information.

---

Kate Hortberg Letter

March 15, 2007

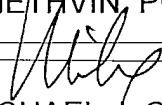
Page 3 of 3

---

---

My best regards,

BEASLEY, ALLEN, CROW,  
METHVIN, PORTIS & MILES, P.C.



MICHAEL J. CROW

MJC/anc

CC: Rick Drummond    **VIA TELEFAX (251) 650-1264**